IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

TRISURA INSURANCE COMPANY	§
Plaintiff,	§
VS.	§ Civil Action No. 23-cv-11053
BIGHORN CONSTRUCTION AND	§
RECLAMATION, LLC; BIGHORN INVESTMENTS AND PROPERTIES,	§ §
LLC; BIGHORN SAND & GRAVEL LLC; BRIDGELINK COMMODITIES LLC;	§ §
BRIDGELINK ENGINEERING LLC; BRIDGELINK INVESTMENTS, LLC;	\$ \$
BRIDGELINK RENEWABLE ENERGY	§
DEVELOPMENT LLC; BRIDGELINK RENEWABLE ENERGY INVESTMENTS	§ §
LLC; INTERMOUNTAIN ELECTRIC SERVICE, INC.; COLE WAYNE JOHNSON	§ §
CORD HENRY JOHNSON;	§
CASSIE HAMILTON,	§ §
Defendants.	§

TO THE HONORABLE JUDGE OF SAID COURT:

In accordance with Rule 26(a)(1) of the Federal Rules of Civil Procedure, Bighorn Construction And Reclamation, LLC; Bighorn Investments And Properties, LLC; Bighorn Sand & Gravel LLC; Bridgelink Commodities LLC; Bridgelink Engineering LLC; Bridgelink Investments, LLC; Bridgelink Renewable Energy Development LLC; Bridgelink Renewable Energy Investments LLC; Intermountain Electric Service, Inc.; Cord Henry Johnson; Cassie Hamilton, (collectively, the "Defendants"), make these disclosures as follows:

1. Name, address, and phone number of each individual likely to have knowledge of discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of information.

RESPONSE

Jicarilla Solar 1 LLC

Fazli Qadir 621 West Randolph St Chicago, IL 60661 312-902-4719 FQadir@HecateEnergy.com

Jicarilla Solar 1 LLC

Cristi Thomas, P.E., Head of Engineering and Construction c/o Repsol Services Company 2455 Technology Forest Boulevard The Woodlands, TX 77381

Trisura Insurance Company

Martin Moss 1411 Opus Place, Suite 450 Downers Grove, IL 60515

Trisura Insurance Company

Stuart Detsky 1411 Opus Place, Suite 450 Downers Grove, IL 60515 stuart.detsky@trisura.com

Trisura Insurance Company

George James, Chief Underwriter 1411 Opus Place, Suite 450 Downers Grove, IL 60515 george.james@trisura.com

Repsol Renewable NA

Federico Toro 2455 Technology Forest Blvd, Building 5 The Woodlands, TX 77381 Federico.toro@repsoleyg.com (832)-461-2002

Repsol Renewable

Chad Campbell 2455 Technology Forest Blvd, Building 5

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Chad.Campbell@repsol.com

Vertex Company Inc

Andrew Brouwer abrouwer@vertexeng.com

Vertex Company Inc

William McConnell wmcconnell@vertexeng.com

Cord Johnson

C/O Vikesh Patel Kearney, McWilliams & Davis, PLLC 55 Waugh #150 Houston, Texas 77007 713-936-9620 ext 107 vpatel@kmd.law

2. A copy of, or a description by category and location of, all documents, data compilations, and tangible things in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

RESPONSE

- Solar Power Facility Engineering, Procurement And Construction Agreement underlying agreement between Bridgelink Engineering LLC and Jicarilla Solar.
- Bonds documents and agreements listing Trisura Insurance Company as the surety, Bridgelink Engineering LLC as the Contractor, and Jicarilla Solar 1, LLC as the Owner.
- All correspondence and documents exchanged regarding the draw-down of the bond in question.
- All communications with Repsol Renewable regarding performance under the underlying Construction Agreement.
- 3. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such

computation is based, including materials bearing on the nature and extent of injuries suffered.

RESPONSE

- \$24,465,404.00 the compensation due under the Solar Power Facility Engineering, Procurement And Construction Agreement
- 4. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE

Not Applicable.

KEARNEY, MCWILLIAMS & DAVIS

By: /s/Vikesh N. Patel

Vikesh N. Patel NYSBN: 6061386 TXSBN: 24124350 vpatel@kmd.law 55 Waugh Drive, Suite 150 Houston, TX 77007

Tel: (713) 736-9620 x108 Fax: (713) 999-5287 Attorney for Defendants

Pending Admission Pro Hac Vice

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 15th day of May 2024, a true and correct copy of the foregoing instrument was served on all parties and counsel of record in accordance with the Rules of Civil Procedure.

/s/Vikesh Patel
Vikesh Patel